

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1

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My comments and suggestions are as follows:

par 11 Concur that the number of license classes be reduced from six to four. However I propose the following basic changes:

Technician - Full privileges on VHF and higher frequencies
(Does not require a Morse code exam)

General - Limited privileges on HF and full privileges on VHF and higher frequencies
(Requires passing a 5 wpm Morse code exam)

Advanced - Increased privileges on HF and full privileges on VHF and higher frequencies
(Requires passing a 13 wpm Morse code exam)

Amateur Extra - Full privileges on all Amateur frequencies
(Requires passing a 20 wpm Morse code exam)

par 12 Concur with phasing the Novice class license out. I suggest that the CW Novice bands be designated for digital emissions only, such as RTTY, AMTOR, FACTOR, G-TOR, PACKET or any other future digital mode

of operation. The Novices should be allowed to operate CW in the frequencies allocated for CW, except for those reserved for the Amateur Extra, and limited to 200 watts of power. I propose that the holder of a Novice Class license could qualify for the General Class operator's license by passing written examination Element 3(B) only, and not requiring them to pass an additional telegraphy examination. Also, the Novice Class license holder should be required to upgrade to any of the higher class licenses,

or, at the time of renewal be designated as a Technician Class operator, and lose all of their HF operating privileges. They should

still retain credit for the 5 wpm Morse code requirement, in the event that they should later decide to upgrade to General, upon showing a copy of their Novice license at the time of testing.

par 13 Concur that the Technician Plus license also should be phased out.

However, those that hold licenses that was granted before March 21,

1987, should be upgraded to General class. Other Technician Plus Class operators could qualify for a General Class operator license by passing written examination Element 3(B) only, and not requiring them to pass an additional telegraphy examination.

par 14 Concur.

par 24 I believe that we should keep the three levels of Morse code requirements to 5, 13 and 20 wpm, however, in view of the fact that the General Class operator's license would be the new entry level for HF privileges, I propose that 5 wpm of

Morse code be the proficiency level for the General Class of license. Subsequently, 13 wpm would be the proficiency level for the Advanced, and 20 wpm for the Amateur Extra. The concept of reducing the required Morse code speed by an accompanying increase of written examination elements does not necessarily make sense, in that, there have always been "new material" added to the question pool in the past, without the reduction of Morse code speed requirements. The most recent of course being the testing material covering environmental concerns of RF exposure.

par 32 In conclusion, I hope that the FCC continues to take the position of only enacting those rule changes that will produce a higher quality of Amateur Radio Service, as opposed to achieving a greater number of participants. There are organizations that want to reduce the requirements and skill levels of the licenses, in order to induce more people into the Amateur Radio Service, but this will also reduce the quality of the Amateur Radio Service, and will not serve the best interests of all. I believe that we should maintain the highest standard of excellence, and serve as a model and template to the rest of the world.